REMARKS

Reconsideration and allowance of the subject application are respectfully requested.

Claims 1-5, 8, 9, and 20-28 remain rejected under 35 U.S.C. §102 as being anticipated by Moon et al. (US 6711740). This rejection is respectfully traversed.

To establish that a claim is anticipated, the Examiner must point out where each and every limitation in the claim is found in a single prior art reference. *Scripps Clinic & Research Found. v. Genentec, Inc.*, 927 F.2d 1565 (Fed. Cir. 1991). Every limitation contained in the claims must be present in the reference, and if even one limitation is missing from the reference, then it does not anticipate the claim. *Kloster Speedsteel AB v. Crucible, Inc.*, 793 F.2d 1565 (Fed. Cir. 1986). Moon fails to satisfy this rigorous standard.

Moon relates to a compression method in which a *synthetic* code book document type definition (DTD) is generated identifying selected compression codes based on specifying code-book extensible markup language tags having semantics defined according to a *generic* code book document type definition (DTD). The compression codes are used to compress <u>API commands</u> (rather than an XML document) defined by second XML tags having semantics defined by a generic API DTD into synthesized data. The synthesized data and the code-book XML tags are supplied to a destination device configured for storing the generic code book DTD and the generic API DTD, thereby enabling the destination device to synthesize a code book for recovery of the API commands (rather than an XML document) from the synthesized data.

To compress an XML document as specified in the claims, a set of codes is generated as a compression key. See the non-limiting example compression key in part (iii) of Figure 2 in the instant application. The compression key defines markup text in the form of markup names defined in the definition part of the XML document with codes. The markup names have a first

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binary size that is smaller than a second binary size of the code set. Each short code relates to and replaces a longer markup name. In the non-limiting example in Figure 2, the code "a" replaces the markup names "start", "vehicle", and "ok"; the code "b" replaces the markup names "start", "vehicle", and "doors"; the code "c" replaces the markup names "start", "vehicle", and "speed"; and the code "d" replaces the markup names "start", "vehicle", and "head". See also pages 19 and 20 of the instant specification.

The amendments emphasize that the claims are directed compressing an XML document in contrast with compressing an API command as in Moon. Compressing an API command is different from compressing markup names in an XML document. The claimed XML document includes two parts and two parts to carry out compression and defining compression keys. Claim 25 for example recites: "an XML document comprising a first part defining markup hierarchies and a second part comprising markup text" with a compressing unit arranged to:

- "generate a set of codes as a compression key defining said data parts defined in said definition part with codes having second binary size less than said first binary size, wherein each code relates to a markup name, said generated codes comprising short codes for said markup hierarchies defined in the first part to be used to replace the markup texts in the second part,"

- "assign at least said markup hierarchy with said set of codes,"

- "replace said data parts in a form of said markup names in said data set by said assigned codes to produce a compressed XML document."

These claimed XML document structures and the claimed operations performed on/with those XML structures are not described in Moon.

The application is in condition for allowance. An early notice to that effect is requested.

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Respectfully submitted,

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